



APPENDIX A
ITEMS 1.2.3.9

Tenterden and Rural Sites DPD

The role of Biddenden as an important rural service centre and the need for a spatial planning approach for the village

Thank you for your letter of 29 June 2009 inviting comments on the Tenterden and Rural Sites DPD.

My comments reinforce all the submissions made previously relating to the role of Biddenden as an important rural service centre in the Borough and the contribution that the development of BID03/17 will make.

Core Strategy/South-East Plan/ Spatial Objectives

The adopted **spatial objective** set out in the Council's overarching LDF document is:

'To sustain vital and viable communities in Tenterden and the villages with the larger service centre roles that serve the surrounding smaller villages and countryside.'

The Council's spatial planning objectives are wedded with those in the South-East Plan adopted May 2009 which at paragraphs 4.23 and 4.24 set out key principles (with reference to specific Core Policies) designed to support and protect rural communities.

The Core Strategy recognises the need for environmental protection and says that:

'rural towns and settlements need to be able to grow to sustain themselves. Providing balanced growth opportunities to allow people to live and work in their own rural town or village and the support of local services is a key recurring theme that comes through consultation with rural communities as is the strong desire to retain the qualities of an attractive environment that define the character of the rural settlements.'

In restricting the growth of Biddenden in the Plan period 2006-2021 to just one small site of 10 units **the Borough Council will fail to meet the spatial objective it has set itself.**

Reasons

Biddenden plays an important role as a rural service centre.

- It has a population of 2434, by far the highest of the third tier villages and on a par with Charing and Wye.
- It continues to score highly on the sustainability matrix
- In accord with 4.4 of the DPD it provides a vital degree of service provision which it is essential to retain and foster
- It is village where suitable economic development should be encouraged to provide local jobs and more sustainable patterns of activity (but has lost numerous businesses in recent years). The Employment Land Review shows no new employment activity in Biddenden since 2006 and only two farm diversification projects between 2003-2005.
- The sustainability of a settlement requires the balancing of housing with employment growth
- Biddenden needs a bolder allocation if it is to remain a healthy, vibrant rural service centre as required by adopted spatial objectives.

Biddenden Parish Response

In contrast to views expressed by other rural service centres (Chilham, Woodchurch and Bethersden) the majority response of Biddenden Rural Community Workshop was that the village was not appropriate to accept allocated development.

This negative response is curious and may be due to the make up of what is described in the DPD as 'an invited cross section of the local community'. This suggests it was not an open forum. Therefore, whether all the issues facing Biddenden were widely discussed is open to question.

The negative response certainly did not reflect the **Key Findings of the Biddenden Parish Plan April 2005 questionnaire** which indicated 'strong support for further limited residential development especially where the Parish receives planning gain.' In this exercise c.1500 questionnaires were distributed to each household in the Parish and were also hand collected. 978 responses were received (65% response rate).

This response is considered to be an important material consideration.

Reference: The Biddenden Parish Plan April 2005 Summary Questionnaire Results

Further, Minutes of the meeting of Biddenden Parish Council of 14 March 2006 indicate that following discussion on the Parish response to the LDF it was agreed that some new housing was acceptable. The Minutes indicate a need to

press for affordable housing and to provide housing for older people who may wish to move to smaller accommodation.

Comments on allocated site for Biddenden

There is no objection to the allocation of the site at Sandeman Way. It is an entirely logical site to develop as it is a rounding off of this part of the village. It is, however, a very restricted site which by reason of the tortuous access through existing housing will not be particularly attractive to developers of open market housing. It lends itself to provision of a further affordable housing scheme.

What it does not do is offer any significant planning gain for the village or meet the spatial objectives designed to sustain vital and viable communities.

A spatial approach in allocating site BID 03/17

Bishop Consultancy Ltd in partnership with Clague has submitted a significant amount of material setting out the principles for development of the BI 03/17 site. They propose a spatial planning approach and accord entirely with the overarching Core Strategy policy and the recently adopted South-East Plan. The documents already submitted should be referred to and need not be repeated here.

We wish to make constructive comment on the Sustainability Appraisal - Reg 27 Publication Version insofar as it concerns BID 03/17, refer to the notes of the Biddenden Community Workshop held on 12 February 2009 and make a short closing representation.

The Sustainability Appraisal for each site examined contains 20 general sustainability issues and a short conclusion. The following comments on BID 03/17 seek to clarify only those issues where clarification appears necessary:

- Geology and Biodiversity – development of this site would conform with Policy CS11 of the Core Strategy. As indicated in the submissions all the land to the west of the site is in the same ownership, would offer potential biodiversity enhancement and would be included in a Biodiversity Action Plan
- Landscape – we do not consider that development would significantly affect the existing natural landscape setting or be clearly visible. There is sufficient land with significant existing structural planting to allow a development sympathetic to the landscape context. New strategic planting would assist with the wider setting.
- Places – the location can hardly be described as peripheral. There is a direct footpath link to the village centre, the distance being similar to the chosen Sandeman Way site. Village services are suggested in the BID

03/17 submission as part of the spatial approach and could make a significant contribution.

- Access to services - the village centre is accessible via the footpath link which could be upgraded to include facility for cyclists and reduce car usage. Vehicular access can be achieved to North Street with safe sightlines as indicated on the submitted plans
- Transport – as stated a safe access to North Street can be achieved. Here there is a bus service with good, regular links to Headcorn railway station.
- **Conclusion** – with a carefully planned layout respecting the site context, and with the provision of substantial new structural planting for which there is adequate space, development of the BID 03/17 site is unlikely to have a negative impact on the character of the area.

The notes on the Biddenden Community Workshop for 12 February 2009 say that:

'both groups felt that BID03 and BID17 had some merit and shouldn't be ruled out at this stage. ...The groups felt that this area could be a location where a cul-de-sac type development could be located. They felt the access could be achieved and appropriate sight lines would be possible from this side of the road.. One group referred back to the Parish Plan which stipulated a desire to see cul-de-sac development coming forward in Biddenden'.

Closing comments

We have set out to explain the reasons why the present development proposals for Biddenden set out in the Tenterden and Rural Sites DPD fail to take a spatial planning approach as required by the Core Strategy and the South-East Plan.

A paltry allocation of 10 units will not sustain the vital and viable community in Biddenden which is an important village in the west part of the Borough with a larger service centre role serving the surrounding smaller villages and countryside.

A bolder approach to village planning in Biddenden is required and one which has the capacity to provide a range of housing choice and to include community facilities and employment land.

Development of the site at BID03/17 in a carefully planned manner would fulfil the spatial objectives to which the Council aspires.

ADB/683 – 7 August 2009
Bishop Consultancy Ltd